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REGULATORY AUTH.

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OFFICE OF THE EXECUTIVE SECRETARY

June 14, 1999

VIA OVERNIGHT MAIL

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

99-00276

Re: Teligent, Inc.'s Revised IntraLATA Toll Dialing Parity Plan, as Required by the Recent Federal Communications Commission Order

Dear Executive Secretary Waddell:

Enclosed herewith for filing, please find Teligent, Inc.'s ("Teligent") revised intraLATA toll dialing parity plan, pursuant to the Federal Communications Commission's recent order. Teligent originally filed its dialing parity plan with the Tennessee Regulatory Authority on April 22, 1999.

Should any questions arise regarding this filing, please do not hesitate to contact the undersigned at (703) 762-5430.

Respectfully submitted,

Carly B. Tolchin

Enclosure

¹ In the Matter of the Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, *Order*, CC Docket No. 96-98, NSD File No. 98-121 [rel. March 23, 1999].

IntraLATA Toll Dialing Parity Plan Teligent, Inc. Tennessee June 1999

I. Purpose

Teligent, Inc. ("Teligent") describes herein the process for implementing intraLATA Toll Dialing Parity in the Teligent exchanges located in the state of Tennessee ("Plan"). The intent of this Plan is to provide a proposal that provides customers the ability to select a telecommunications carrier of their choice for routing their intraLATA toll calls. Teligent will comply with all Federal Communications Commission and Tennessee Regulatory Authority Rules and Regulations.

II. IntraLATA Environment

Teligent will implement intraLATA toll dialing parity upon launch of its service in Tennessee. As a result, Teligent's Tennessee customers will dial seven digits for local calls and 1+10 digits for intraLATA toll calls.

In addition, Teligent will also initiate toll-free intraLATA county-wide calling, in accordance with the Authority's requirements. Teligent will maintain tax-code billing tables to identify "free county-wide" intraLATA toll calls originated by Teligent intraLATA toll customers and to ensure that toll billing does not occur on these calls.

III. Implementation Schedule

Teligent will offer dialing parity for intraLATA toll in all of its Tennessee exchanges upon launch of its services in the State. Teligent anticipates launching its services in Tennessee in the second half of 1999. Attachment A is a specific listing of all the counties in which Teligent intends to offer intraLATA services. Attachment B is a specific listing of the LATAs in which Teligent will associate.

As a publicly traded company, Teligent is unable to release more specific information regarding its launch date.

IV. Carrier Selection Procedures

Upon launch of its services in Tennessee, Teligent will implement a 2-PIC carrier selection methodology within the State. With the 2-PIC methodology, customers will be able to presubscribe to one IXC, including Teligent, for interLATA toll calls and to presubscribe to the same or a different IXC for intraLATA toll calls. Upon selection of Teligent as a service provider, customers are informed of the opportunity to choose both an intraLATA and interLATA PIC. At the customer's request, Teligent will provide a list of IXCs that are available for PIC selection. That list will be presented in a competitively neutral manner.

Customers who do not affirmatively choose an intraLATA toll carrier will be identified within Teligent's system as "no-PIC." These customers must dial an access code in order to place intraLATA toll calls until they have made an affirmative intraLATA toll PIC selection.

Customers will be able to make their initital intraLATA toll PIC selection free of charge. Pursuant to Teligent's tariff, customers will be charged a \$5.00 PIC change charge when changing either their intraLATA or interLATA toll carrier regardless if the change is requested in one contact with the business office or if one carrier is selected for both intraLATA and interLATA toll services.

Teligent has a strict anti-slamming policy. Teligent is familiar with the Authority's rules related to slamming [Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2) - (6)].

Teligent has not yet launched service in Tennessee and, therefore, has no existing customers.

V. Carrier Notification

Prior to launching service in Tennessee, Teligent will contact as many IXCs as possible regarding the opportunity to provide toll service to Teligent customers. Interested carriers will be asked to submit to Teligent an Access Service Request ("ASR") form for each switch to which it desires access. Teligent lists its switches available for exchange access service in either

NECA Tariff No. 4 or Teligent's Tariff FCC No. 3. Once Teligent receives and processes an IXC's ASR, that carrier is added to the list of IXCs available for customer selection.

VI. Access to Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" in Teligent's territory for accessing the local exchange Directory Assistance and customers dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

The local and interLATA Operator Services and Directory Assistance may be branded by the local and interLATA carriers, as appropriate, based on the dialing parity pattern of the end user. Since no unique intraLATA dialing pattern currently exists in the industry, Teligent is not capable of identifying intraLATA calls to Teligent's local or the IXC's interLATA operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 51-217(d).

VII. Cost Recovery

Teligent does not currently plan to recoup the incremental cost of implementing intraLATA toll dialing parity but reserves the right to do so in the future. Should Teligent make such a determination, it will provide advance notice to the Authority.

Attachment A

Teligent, Inc. IntraLATA Toll Dialing Parity Exchanges

Cheatham County
Davidson County
Dickson County
Robertson County
Rutherford County
Shelby County
Summer County
Tipton County
Williamson County
Wilson County

Attachment B

Teligent, Inc. IntraLATA Toll Dialing Parity LATAs

470 Nashville472 Chattanooga474 Knoxville956 Bristol